

POLREP #2
VALLEY FORGE NATIONAL PARK ASBESTOS SITE
RTE 23 & GULPH RD
VALLEY FORGE, MONTGOMERY COUNTY, PA 19482

EVENT: REMOVAL ACTION

I. SITUATION (AS OF 1700 HOURS, 05/21/97):

- A. A PORTION OF VALLEY FORGE (VF) NATIONAL PARK WAS THE SITE OF AN ASBESTOS MANUFACTURING OPERATION PRIOR TO BEING DONATED TO THE PENNSYLVANIA PARK COMMISSION. THE NATIONAL PARK SERVICE (NPS) ASSUMED ADMINISTRATION OF THE PARK IN 1976. AREAS OF THE PARK IN WHICH EXPOSED ASBESTOS HAVE BEEN IDENTIFIED ARE ASSOCIATED WITH OLD ASBESTOS DISPOSAL PITS IN CLOSED QUARRIES ON VF NATIONAL PARK PROPERTY. ADDITIONALLY, AREAS ALONG AN ASBESTOS-CONTAINING MATERIAL (ACM) SLURRY PIPELINE ARE CONTAMINATED WITH ACM SLURRY MATERIAL. SAMPLING OF THE EXPOSED MATERIALS BY THE PARK SERVICE HAS CONFIRMED THE PRESENCE OF ASBESTOS. ACCORDING TO VF NPS EMPLOYEES, THE BUILDINGS WHERE ASBESTOS OPERATIONS TOOK PLACE WERE DEMOLISHED AND BURIED IN AT LEAST 3 QUARRIES.
- B. BASED ON OBSERVATIONS DURING A JOINT INSPECTION OF THE VF NATIONAL PARK CONDUCTED BY OSC KOOB, AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY (ATSDR) REPRESENTATIVE CHARLES WALTERS, AND VF NPS OFFICIALS, THE OSC DETERMINED THAT THE SITE CONDITIONS MET THE CRITERIA OF AN EMERGENCY REMOVAL ACTION. PURSUANT TO DELEGATION OF AUTHORITY 14-1-A, THE OSC OBLIGATED \$200,000 TO INITIATE AN EMERGENCY REMOVAL ACTION TO STABILIZE AND, WHERE APPROPRIATE, DISPOSE OF HAZARDOUS SUBSTANCES (ACM) AT THE SITE.
- C. PERSONNEL ON SITE: EPA-2, VF PARK SERVICE-1, PA DEP-1, SATA-2, ERCS-2.
- D. WEATHER: TEMPS IN 70'S, PARTLY CLOUDY, WINDS 5-10 MPH.

II. ACTIONS TAKEN:

- A. AT 0800 HOURS, OSC MET WITH THE FOLLOWING PERSONNEL AT THE VF ADMINISTRATIVE OFFICE: EPA SENIOR COMMUNITY INVOLVEMENT COORDINATOR (CIC) HAL YATES, PA DEP REPRESENTATIVE (REP) SCOTT BEAUDWAY, VF NPS REP EARL CRAM, SATA AND ERCS. OSC GAVE A BRIEF SYNOPSIS OF EPA'S INVOLVEMENT IN THIS SITE AND THE NATURE OF SUPERFUND EMERGENCY RESPONSE. A UNIFIED COMMAND WAS FORMALLY ESTABLISHED BY THE OSC AND IS COMPRISED OF STATE, NPS, AND EPA REPRESENTATIVES. VF NPS REP CRAM GAVE A HISTORY OF THE ASBESTOS PROBLEM AT THE SITE.
- B. OSC TASKED SATA TO DEVELOP A SITE SAFETY PLAN DETAILING AIR SAMPLING/MONITORING PLANS, CONDUCT HISTORICAL DOCUMENT RESEARCH AND DEVELOP A SITE ASSESSMENT PLAN TO ADDRESS THE EXTENT OF ASBESTOS CONTAMINATION.
- C. EPA SENIOR CIC YATES DISCUSSED HIS ROLE AT THIS HIGHLY VISIBLE SITE DURING REMOVAL ACTIONS. HE WILL ESTABLISH A JOINT INFORMATION CENTER AND DEVELOP PRESS RELEASES DETAILING SITE ACTIVITIES AND ADDRESS ANY GENERAL PUBLIC

CONCERNS.

- D. IN RESPONSE TO A QUESTION POSED BY PADEP REP BEAUDWAY, OSC EXPLAINED THAT EPA ACTIVATED SUPERFUND AT THE SITE DUE TO LACK OF RESOURCES FOR THE VF NPS AND THE STATE AND BASED ON A RECOMMENDATION FROM ATSDR CONCERNING THE HEALTH THREAT TO THE GENERAL PUBLIC.
- E. OSC TASKED ERCS TO DEVELOP A WORK PLAN WHICH WOULD PRIORITIZE THE TASKS BASED ON ACCESS AND EXPOSURE OF GENERAL PUBLIC.
- F. AT 0930 HOURS, VF NPS REP CRAM CONDUCTED A SITE TOUR FOR PA DEP, SATA AND ERCS. SEVERAL AREAS WERE OBSERVED WHERE EXPOSED ASBESTOS WAS LOCATED. SOME OF THESE AREAS HAD HIGH VISIBILITY FENCING AND WARNING SIGNS POSTED. OTHER LOCATIONS HAD CAUTION TAPE SURROUNDING THE ACM AREAS.
- G. ERCS DRAFTED A WORKPLAN WHICH PRIORITIZED THE TASKS TO BE PERFORMED IN THE INITIAL PHASE OF SITE OPERATIONS. FIRST PRIORITY WAS TO PLACE HIGH VISIBILITY FENCING AND WARNING SIGNS ON BOTH SIDES OF THE DRAINAGE DITCH ALONG COUNTY LINE ROAD TO THE HORSE TRAIL AT THE OLD RAIL BED, AT THE CAVE QUARRY LOCATION ALONG COUNTY LINE ROAD, ALONG THE STEEP RAVINE (OLD RAILROAD TIES LOCATION) AT THE KEENE QUARRY, AN AREA OF ASBESTOS LOCATED AT SOUTH BANK OF KEENE QUARRY, AND REINFORCE THE EXISTING FENCING AT THE AMPHITHEATER QUARRY. SECOND PRIORITY WAS TO WET DOWN AND SET UP SPRINKLER SYSTEMS FOR THE ASBESTOS LOCATED IN THE DRAINAGE DITCH, RAVINE AREA AND ASBESTOS PILE AT KEENE QUARRY, AND THE COVERED ASBESTOS PILE AT THE AMPHITHEATER QUARRY. THE THIRD PRIORITY IS TO PLACE POLY SHEETING OVER THE EXPOSED ASBESTOS PILES AT THE RAIL BED AT KEENE QUARRY AND AT THE AMPHITHEATER QUARRY. DUST CONTROL MEASURES AND AIR MONITORING OPERATIONS WILL BE IMPLEMENTED TO ENSURE PROPER PPE ARE USED.
- H. SATA MET WITH VF NPS ARCHIVIST SCOTT HOUTING TO BEGIN RESEARCH OF HISTORICAL DOCUMENTS.
- I. AT 1600 HOURS, OSC CONDUCTED MEETING TO REVIEW OPERATIONS. VF NPS HAS VOLUNTEERED OFFICE SPACE IN MAINTENANCE AREA FOR EPA OPERATIONS DURING DURATION OF REMOVAL ACTIVITIES. OSC DETERMINED THAT LEVEL C PPE WOULD BE APPROPRIATE MINIMUM LEVEL OF PROTECTION FOR OPERATION INVOLVING WETTING ACM.

FUTURE ACTIONS:

- A. ERCS TO MOBILIZE PERSONNEL AND EQUIPMENT FOR 0700 HOURS ON 05/22/97 FOR INITIATING STABILIZATION OPERATIONS.
- B. SATA ENGINEER ON SITE 05/22/97 TO BEGIN EXTENT OF CONTAMINATION PLAN. SATA ALSO TO CONTINUE HISTORICAL DOCUMENT RESEARCH.
- C. MOBILE COMMAND POST TO BE ON SITE ON 05/22/97.

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